

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF NEW YORK; KATHLEEN HOCHUL,  
Governor of New York, in her Official Capacity;  
LETITIA A. JAMES, Attorney General of New York, in  
her Official Capacity; MARK J. F. SCHROEDER,  
Commissioner of the New York State Department of  
Motor Vehicles, in his Official Capacity,

Defendants.

**NOTICE OF MOTION**

No. 25-cv-205 (AMN) (MJK)

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, and all prior pleadings and proceedings herein, defendants State of New York, New York Governor Kathleen Hochul, New York Attorney General Letitia James, and the State Department of Motor Vehicles Commissioner Mark J.F. Schroeder, by their undersigned attorneys, will move this Court, before the Honorable Anne M. Nardacci, at the James T. Foley United States Courthouse, 445 Broadway, Albany, New York 12207, at a date and time to be designated by the Court, for an order dismissing the complaint, dated February 12, 2025, pursuant to Fed. R. Civ. P. 12(b), and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
March 25, 2025

LETITIA JAMES  
*New York State Attorney General*  
Attorney for Defendants

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